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FOUNDED 1866

February 27, 2006

**BY MESSENGER**

Mr. Mazin M. Enwiya, RPM  
Remedial Response Section #3  
U.S. Environmental Protection Agency  
77 West Jackson Boulevard, 6<sup>th</sup> Floor  
Chicago, IL 60604-3590

EPA Region 5 Records Ctr.



265619

Re: Ellsworth Industrial Park Site, Downers Grove, Illinois  
Comments of Ames Supply Company to Preliminary Planning Report

Dear Mr. Enwiya:

On behalf of Ames Supply Company ("Ames"), we are submitting these comments to U.S. EPA's draft Preliminary Planning Report dated January 20, 2006 ("PPR") (including the draft Appendix C Scope of Work ("SOW")). These comments shall in no event be construed as an admission, in whole or in part, of liability or responsibility for conditions in or around the Ellsworth Industrial Park.

1. **Section 1 of the PPR; Paragraph 1.2.2.2 -- Previous Field Investigations; Due Diligence and Hydrogeologic Investigations -- 2537 Curtiss Street Property; page 9 of 11, third line:** There is a reference to 119 mg/Kg. The units are incorrect in this reference. It should be 119 ug/Kg.

2. **Section 2 of the PPR; Paragraph 2.3 -- Potential Sources; Primary Study Subareas; Subarea G; page 29 of 38, sixth line:** There is a sentence that states: "A solvent degreaser was present at this facility." This statement is inaccurate and should be deleted. Although this statement has appeared in several reports by U.S. EPA and others, a solvent degreaser was never present at the 2537 Curtiss Street facility ("the Ames facility"). Sworn testimony in the Muniz litigation has confirmed the absence of such a solvent degreaser.

3. **Section 2 of the PPR; Paragraph 2.3.1.7 -- Subarea G; page 33 of 38; second line:** The bullet point at the top of the page states: "The potential contamination located under the buildings within Subarea G, which is unknown because no soil samples have been collected from under the buildings." This is incorrect with respect to the Ames facility. As U.S. EPA is aware, approximately 8 soil samples have been taken beneath the floor at the Ames facility as part of past due diligence activities.

4. **Figure 2-16 of the PPR:** The soil isoconcentration contours by the Ames facility on this figure are exaggerated and inappropriately drawn. The contours extend to the

Ames facility from one data point (GP41) on the 2525 Curtiss Street property to the east. The contours should be confined to the 2525 Curtiss Street property.

5. **Figure 2-18 of the PPR:** The soil isoconcentration contours by the Ames facility on this figure are exaggerated and inappropriately drawn. The contours extend to the Ames facility from one data point (GP41) on the 2525 Curtiss Street property to the east. The contours should be confined to the 2525 Curtiss Street property.

6. **Figure 2-33 of the PPR:** The shallow groundwater isoconcentration contours by the Ames facility on this figure are grossly exaggerated and inappropriately drawn. The contours ignore other monitoring wells at the Ames facility that are either non-detect or dry. As a result, the contouring around MW-3 and MW-8 inappropriately extends beyond the Ames facility. This contouring should be limited to the area immediately surrounding MW-3 and MW-8.

7. **Figure 2-34 of the PPR:** The intermediate groundwater isoconcentration contours by the Ames facility on this figure are grossly exaggerated and inappropriately drawn. *The contours ignore other monitoring wells at the Ames facility that are either non-detect or dry.* In addition, the contouring around the Ames facility is based on two data points (SB-11 and CPT-53) which have concentrations below MCLs for both PCE and TCE. As a result, the contours resulting from these two data points are grossly overdrawn.

8. **Figure 2-35 of the PPR:** The bedrock groundwater isoconcentration contours by the Ames facility on this figure are exaggerated and inappropriately drawn. As you are aware, the bedrock wells at the Ames facility (BD-12 and BD-13) are non-detect. The contours resulting from BD-14 on the 2525 Curtiss Street property to the east should not extend to any part of the Ames facility.

9. **Comments to SOW relating to 2500 Curtiss Street property.** See **Paragraph 3.5.12 – Other Areas, page 13 of 28; Paragraph 3.6.12 – Other Areas, page 19 of 28; Figure C-12 to SOW:** Additional soil borings and groundwater monitoring wells should be installed on the 2500 Curtiss Street property as part of the RI/FS, given the existing detections on this property, as well as the limited sampling that has been conducted on this property to date. Although the SOW estimates 10 soil borings on this property for cost purposes, it also states that this number could be reduced or eliminated based on the results of the utility corridor sampling and the soil gas survey. Some soil borings should be made on this property regardless of the results of the utility corridor sampling and the soil gas survey, including soil borings south of the building along Curtiss Street. In addition, only 3 groundwater wells have been proposed at this property. Given the existing detections on the property, additional groundwater wells should be installed south of the building along Curtiss Street. Specifically, at least two or three additional wells should be spaced and installed south of the building along Curtiss Street. Possible locations for the additional sampling noted in this paragraph are shown by hand notation on Exhibit A, enclosed with this letter.

10. **Figure C-7 to SOW:** The following comments relate to the proposed sampling in Study Area G, as depicted in Figure C-7:

(a) Additional sub-slab gas samples should be taken at the 2525 Curtiss Street property. At least one sub-slab sample should be taken in the area of the former vapor degreaser, which is located in the north-central part of the building.<sup>1</sup> This location is shown by hand notation on Exhibit B, enclosed with this letter.

(b) At least two sub-slab gas samples should be taken at the Downers Grove National Bank property located directly west of the Ames facility. The PPR/SOW does not currently propose any sub-slab gas samples under this building. Given the detections on this property, as well as the limited data which currently exists at the property, sub-slab gas samples are clearly warranted. In addition, additional soil borings and groundwater wells should be installed immediately east of the building. Possible locations for this additional sampling are shown by hand notation on Exhibit B.

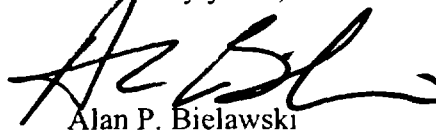
(c) The PPR/SOW currently proposes three sub-slab gas samples at the Ames facility. Given that approximately 8 soil borings have already been taken under the building slab at the Ames facility as part of past due diligence activities, these three additional sub-slab gas samples are not necessary.

(d) In Figure C-7, the property directly south of the Downers Grove National Bank property is listed as "2537 Curtiss St." This property is not part of the Ames facility, and thus should not be marked with the 2537 Curtiss St. address. We think this property is now owned by Molex, which occupies the facility to the west of this property – directly across Katrine Street.

\* \* \* \* \*

If you have any questions about the comments contained in this letter, please feel free to give me a call.

Very truly yours,



Alan P. Bielawski

Enclosures

cc: Thomas Krueger (by Messenger)

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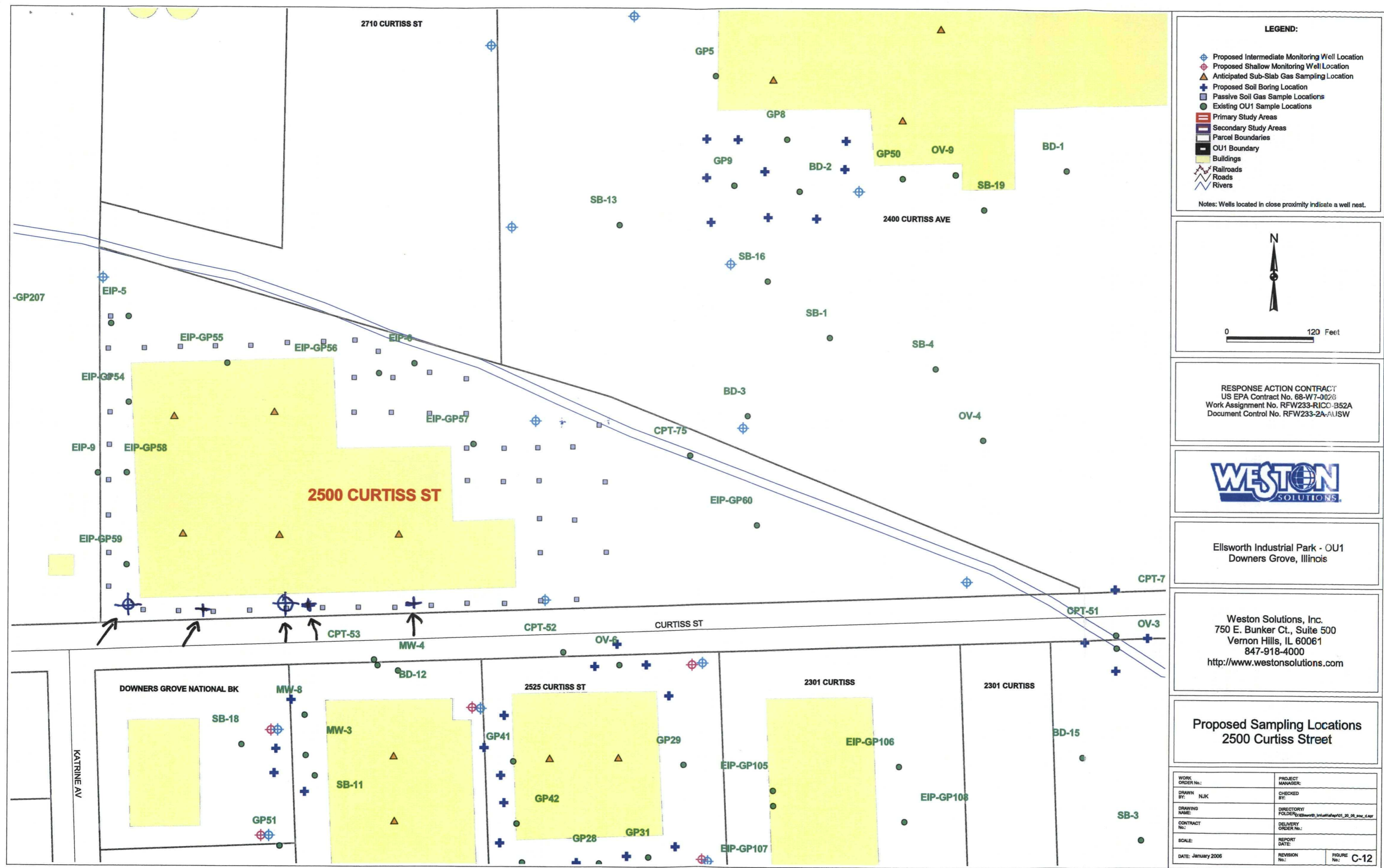
<sup>1</sup> We assume actual sub-slab sample locations will be selected based on known facility operations that involved the use of chlorinated solvents (such as vapor degreasers).

U.S. ENVIRONMENTAL  
PROTECTION AGENCY

FEB 28 2006

OFFICE OF REGIONAL  
COUNSEL

EXHIBIT A



# EXHIBIT B



**LEGEND:**

- Proposed Intermediate Monitoring Well Location
- Proposed Shallow Monitoring Well Location
- Anticipated Sub-Slab Gas Sampling Location
- Proposed Soil Boring Location
- Passive Soil Gas Sample Locations
- Existing OU1 Sample Locations
- Primary Study Areas
- Secondary Study Areas
- Parcel Boundaries
- OU1 Boundary
- Buildings
- Railroads
- Roads
- Rivers

Notes: Wells located in close proximity indicate a well nest.

N

0 120 Feet

RESPONSE ACTION CONTRACT  
US EPA Contract No. 68-W7-0026  
Work Assignment No. RFW233-RICO-B52A  
Document Control No. RFW233-2A-AUSW



Ellsworth Industrial Park - OU1  
Downers Grove, Illinois

Weston Solutions, Inc.  
750 E. Bunker Ct., Suite 500  
Vernon Hills, IL 60061  
847-918-4000  
<http://www.westonsolutions.com>

Proposed Sampling Locations  
Study Area G

WORK ORDER No.:	PROJECT MANAGER:
DRAWN BY: NJK	CHECKED BY:
DRAWING NAME:	DIRECTORY/ FOLDER: Ellsworth_IndustrialParkOU1_20_08_sam_d.dwg
CONTRACT No.:	DELIVERY ORDER No.:
SCALE:	REPORT DATE:
DATE: January 2008	REVISION No.:
	FIGURE No. C-7